



418890

Re: Roy F. Weston Report / 9 June Meeting
Whitsds to: Shari Kolak

06/29/2004 02:58 PM

Shari,

The CD ROMS that the library copied for me contain the administrative record, including many of the KRSB BBL documents, and letters and memos posted to the record by the PRPs. They are very difficult to use. The program does not have the ease of use of Adobe Acrobat or the Roxio program that was used for the Roy F. Weston report. I could not find the Weston report on any of the four CDs, but am uncertain that the program is presenting the correct directory of files for each CD, or reverting to the directory for the first CD opened.

I did get the Roy F. Weston report from Rich/Eric. I have not had much time to review it, but several things are immediately notable: inclusion of Dioxin in analysis, Aroclor 1242, 1254 and 1260 differentiation in analysis, a lack of conclusions.

I spoke with Paul Bucholtz who informed me that the Dioxin analysis was done at the request of the MDEQ. I then note that the text of the document suggests that Dioxin may be generated by pulping operations. While this is potentially the largest source of Dioxin (pulp mills which bleach with elemental chlorine), to my knowledge there has never been a bleached pulp operation in the Kalamazoo River Valley. Elemental chlorine may have been used for brightening recycled pulps, but dioxin generation would have been very minimal compared to virgin pulp mills. I subsequently noted that the MDEQ map for background Dioxin levels shows the second highest level at a site near Battle Creek. I have not followed up to try to determine the source: possibly an incinerator or metal recycling operation.

The presentation of the Aroclor congener data is somewhat misleading. 1260 is noted as almost ubiquitous, and is usually mentioned first. However, the congener known to dominate the contamination of the Kalamazoo River, 1242, is treated as if it were just one of many. It is well documented that 1260 is likely to be found in almost any water/sediment system because of its widespread use in electrical equipment and the poor control on leaks and disposal after it was declared illegal. It is somewhat surprising that Aroclor 1016 was not tracked, because it largely replaced 1260 in electrical gear in the early 1970s. Stratigraphy of the 1260/1016 shift might have assisted source determinations.

The report provides no summary of findings, such as three dimensional mapping which might help visualize the size and shape of the contaminated sediment mass.

The fact that the Weston report dealt with Otsego City impoundment calls into question the USGS deferral of a report on that impoundment, although the basic surveys have been completed.

<http://mi.water.usgs.gov/splan5/sp10100/kaladam.php>

Do you know the reason for this?

Best Regards,

Robert Whitesides

In a message dated 6/26/2004 4:47:58 PM Eastern Daylight Time,
Kolak.Shari@epamail.epa.gov writes:

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>Best Regards,
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>Robert Whitesides
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